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June 5, 2006

Andrea Nixon
Clerk, Cable Television Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02111

Dear Clerk

The Town of Lancaster would like to register its strong opposition to Verizon's March 16, 2006 rulemaking petition filed with the Cable Division of the Department of telecommunications and Energy. Verizon's petition proposes extremely unreasonable new rules for initial cable licensing.

The proposed rules would require a municipality to hold a public hearing on an initial cable television license application within 60 days of the application filing, and would require only 30 days from the time of the public hearing for the municipality to approve or disapprove the application, and issue the actual license in case of approval.

As most local officials will tell you, it is impossible to conclude a proper initial license application review, negotiation, license drafting and issuance within 30 days of the public hearing. Such an initial licensing time frame would be untenable in the best circumstances, and is particularly untenable now in light of the many questions of first impression and complex issues raised by the non-standard terms and conditions commonly reported to be included in Verizon-proposed cable licenses.

As you know from RCN's initial licensing experience, cable operators willing to negotiate customary and standard cable licenses enjoy reasonable and fast municipal licensing. The existing license timetables have worked well for decades. They should not be changed at the behest of a single proponent. Note that Congress contemplated and provided for a three-year renewal process when it more comprehensively and carefully set forth cable licensing rules in the 1984 Cable Act. This framework worked well for decades and there is no rational basis for casting aside the time tested licensing rules and replacing them with radically abbreviated rules.

It is unrealistic in a time where it takes many of the companies more than 30 days to fix their own infrastructure, to be able to address a 10-year license in the same time period. The goal is to match high paid professionals against volunteer Cable Advisory Committees in a fast track process to undermine the abilities of cities and towns to be able to adequately review and

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comment on their operations. We see no reason to change the current system to benefit any one provider, whose interest is in the stockholder, not the consumer. The Massachusetts Cable Division should reject the Verizon position and allow local officials to continue serving their constituents as they have been doing so for decades.


Thank you for your attention to this matter. If you have any further questions or desire further comment, please do not hesitate to contact us.

Sincerely,

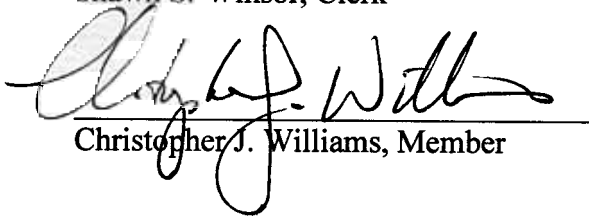
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